



DEPARTMENT OF  
**COMMERCE**  
COMMUNITY AND  
ECONOMIC DEVELOPMENT

Regulatory Commission of Alaska

*Sean Parnell, Governor*  
*Emil Notti, Commissioner*  
*Robert M. Pickett, Chairman*

September 16, 2009

In reply refer to: Common Carrier Section  
File: Docket U-09-065  
LO#: L0900486

Martin M. Weinstein  
Regulatory Attorney  
GCI Communication Corp.  
2550 Denali, Suite 1000  
Anchorage, AK 99503

Dear Mr. Weinstein:

GCI Communication Corp. d/b/a General Communication, Inc. d/b/a GCI (GCI) filed a request for designation as an eligible telecommunications carrier (ETC) providing local exchange service in the Copper Valley Telephone Cooperative (CVTC) study area on June 23, 2009. (Request) We require additional information for our review of GCI's request. Please provide the following:

1. Under 47 U.S.C. 214(e)(4), if CVTC were permitted to relinquish its ETC designation as is provided for under law, and CVTC ceased providing universal service, then the Commission could require the remaining ETCs to ensure that all customers served by the relinquishing carrier would continue to be served. If CVTC relinquished its ETC designation and GCI became the only local exchange ETC in the CVTC study area, would GCI be willing to provide facilities based local exchange service to the relinquished customers of CVTC?
2. Regarding the proposed Network Improvement Plan, GCI should provide yearly estimates of the operating costs associated with service provisioning in the CVTC study area.
3. GCI shows network improvements in the Valdez exchange through 2012. GCI should explain whether it plans further network deployment and/or improvements beyond this date either in Valdez or in other exchanges. If further improvements or network deployment is not planned, GCI should explain how it will otherwise use universal service funding to benefit the CVTC study area.
4. GCI claims that granting of ETC status will support development of facilities based competition in a competitively neutral manner. (Petition at 14) However, under GCI's application facilities based competition would be available only in Valdez and not in

the remainder of the CVTC study area. How can the Commission be assured that granting GCI's application for ETC status will not provide GCI with an undue competitive advantage given GCI would gain ETC status study area wide, but would limit its facilities based service to Valdez?

5. The public interest benefits described by GCI in its application apply almost exclusively to the Valdez exchange where service will be provided through GCI facilities. What public interest benefit is provided by GCI's provisioning of services as an ETC through resale of CVTC services for all locations outside of Valdez?
6. GCI states it is exploring the potential future deployment of fixed wireless service in the CVTC study area. (Petition at 2) Please explain the locations and circumstances under which GCI would deploy fixed wireless to meet its ETC obligations in the CVTC area.
7. Regarding Lifeline service, GCI should show the monthly rate charged for local exchange service and the actual discounts applied to that rate.

Please submit the requested information by September 30, 2009. If you have questions regarding this letter please contact Wendy Arnett, Common Carrier Specialist, at (907) 263-2178.

Sincerely,



Robert M. Pickett  
Chairman